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July 10, 2003

Via US Mail and e-mail

Ms. Linda Fisher, Acting Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 2211

**Re: Rubber and Plastic Additives (RAPA) Panel
HPV Chemical Challenge Program Submission
Styrenated Phenols Category
Category Justification and Testing Rationale**

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Dear Ms. Fisher:

The RAPA Panel of the American Chemistry Council is pleased to submit the attached documents to EPA's High Production Volume (HPV) Chemical Challenge Program (Program) to fulfill our commitment for two of the 37 chemicals the RAPA Panel is voluntarily sponsoring in the Program. The RAPA Panel consists of the following member companies: Alco Chemicals; Bayer Polymers LLC.; Ciba Specialty Chemicals Corporation; Crompton Corporation; Eliokem; Inc.; Flexsys America L.P.; The Goodyear Tire & Rubber Company; The Lubrizol Corporation; Noveon, Inc.; and, R.T. Vanderbilt Company, Inc.

This submission consists of a Test Plan and Robust Summaries for the Styrenated Phenols Category (CAS numbers 68457-74-9 and 61788-44-1), and constitutes a partial revision of documents previously submitted to the Program by the RAPA Panel. In the previous submission, dated December 18, 2001, the Styrenated Phenols were included in a category called "Hindered Phenols." In comments dated December 5, 2002, EPA noted that "the data provided by the sponsor support the category with respect to the physicochemical, environmental fate and ecotoxicological properties of these substances; the health endpoints are less well supported." Comments received from Environmental Defense (dated May 23, 2002) also raised concerns about the "Hindered Phenols" category. On reevaluation, the RAPA Panel concluded that, based on existing data, the comments raised useful points to be addressed by in revised materials. Accordingly, revised Test Plans and Robust Summaries for the eight chemicals that comprised the former "Hindered Phenols" category will be submitted as two categories (Styrenated Phenols and Bridged Alkyl Phenols) and two stand-alone chemicals (CAS numbers 68610-51-5 and 27676-62-6).



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Linda Fisher
RAPA-IIPV
July 10, 2003
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The two chemicals included in the Styrenated Phenols category are listed in the following table:

RAPA Panel Styrenated Phenols Category Chemicals Sponsored in the US HPV Chemical Challenge Program	
CAS Number	Compound Name
61788-44-1	styrenated phenol
68457-74-9	isobutyleneated methylstyrenated phenol

Attached to this letter are the *Category Justification and Testing Rationale* document and Robust Summaries supporting the Styrenated Phenols Category.

This submission also is being sent electronically to the following e-mail addresses:

Oppt.ncic@epa.gov
Chem.rtk@epa.gov

If you require additional information, please contact the RAPA Panel's technical contact, Dr. Anne P. LeHuray at (703) 741-5630 or anne_lehuray@americanchemistry.com.

Sincerely yours,

Courtney M. Price
Vice President, CHEMSTAR

Attachments